

EXHIBIT C

NO. _____

JESUS ARREDONDO
Plaintiff,**V.****STATE FARM MUTUAL**
AUTOMOBILE INSURANCE
COMPANY
Defendant.§ **IN THE DISTRICT COURT**
§
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§ **_____ JUDICIAL DISTRICT**
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§ **OF HARRIS COUNTY, TEXAS****PLAINTIFF'S ORIGINAL PETITION****TO THE HONORABLE JUDGE OF SAID COURT:**

NOW COMES Plaintiff, Jesus Arredondo, hereinafter called Plaintiff, complaining of and about State Farm Mutual Automobile Insurance Company, hereinafter called Defendant; and would show unto the Court the following:

DISCOVERY CONTROL PLAN LEVEL

1. Plaintiff intends that discovery be conducted under Discovery Level 2.

PARTIES AND SERVICE

2. Plaintiff, Jesus Arredondo, is an Individual whose address is 9710 Green Valley Ln., Houston, Texas 77064.
3. The last three numbers of Jesus Arredondo's driver's license number are 091. The last three numbers of Jesus Arredondo's social security number are 351.
4. Defendant State Farm Mutual Automobile Insurance Company, a Corporation based in Texas, is organized under the laws of the State of Texas, and service of process on the Defendant may be effected pursuant to sections 5.201 and 5.255 of the Texas Business Organizations Code, by serving the registered agent of the corporation, Corporation Service Company, at 211 East 7th St STE 620 Austin, Texas 78701-3218 its registered office. Service of said Defendant as

described above can be effected by certified mail, return receipt requested.

JURISDICTION AND VENUE

5. The subject matter in controversy is within the jurisdictional limits of this court.
6. Plaintiff seeks:
 - a. monetary relief over \$100,000 but not more than \$200,000.
7. This court has jurisdiction over the parties because Defendant is a Texas resident.
8. Venue in Harris County is proper in this cause under Section 1952.110(2) of the Texas Insurance Code because the accident occurred in said county.

FACTS

9. On or about June 21, 2018, a motor vehicle accident involving Plaintiff, Jesus Arredondo and Pedro Rios occurred as follows: Plaintiff, Jesus Arredondo was the driver of a vehicle traveling south bound on or about the 12100 block of S.H. 249. Pedro Rios was the driver of an uninsured vehicle traveling south bound on or about the 12100 block of S.H. 249 directly alongside of the Plaintiff's vehicle. Plaintiff, Jesus Arredondo brought his vehicle to a complete stop at the intersection of S.H. 249 and Mosielee St when Pedro Rios failed to maintain his lane and struck the Plaintiff's vehicle.
10. As a direct and proximate cause of the accident, Plaintiff, Jesus Arredondo, sustained injuries.

CLAIM FOR UNINSURED BENEFITS

11. On June 21, 2018, the date of the accident, Jesus Arredondo was covered by insurance issued by Defendant, policy number 0772781-E09-53U, issued effective for May 9, 2018 expired November 9, 2018. This policy included coverage for uninsured motorists. Plaintiff, Jesus Arredondo, is a valid "covered person" under this policy as the insured.

12. Defendant was timely informed of the accident and that Plaintiff intended to claim under uninsured benefits in a letter dated June 21, 2018.

13. The driver responsible for this accident did not have liability coverage. The injuries sustained by Plaintiff were not the result of intentional acts but were accidental and caused by the negligence of the uninsured driver, Pedro Rios. Plaintiff hereby seeks recovery for injuries under uninsured coverage.

DAMAGES FOR PLAINTIFF, JESUS ARREDONDO

14. As a direct and proximate result of the occurrence made the basis of this lawsuit, Plaintiff, Jesus Arredondo was caused to suffer back pain and pain in his right ankle.

15. As a direct and proximate result of the occurrence made the basis of this lawsuit, Plaintiff, Jesus Arredondo has incurred the following:

- A. Reasonable medical care and expenses in the past. These expenses were incurred by Plaintiff, Jesus Arredondo for the necessary care and treatment of the injuries resulting from the accident complained of herein and such charges are reasonable and were usual and customary charges for such services in Harris County, Texas;
- B. Reasonable and necessary medical care and expenses which will in all reasonable probability be incurred in the future;
- C. Physical pain and suffering in the past; and
- D. Mental anguish in the past.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff, Jesus Arredondo, respectfully prays that the Defendant be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for the Plaintiff against Defendant for damages in an amount within the jurisdictional limits of the Court; together with pre-judgment interest (from the date of injury through the date of judgment) at the maximum rate allowed by law; post-judgment interest

at the legal rate, costs of court; and such other and further relief to which the Plaintiff may be entitled at law or in equity.

Respectfully submitted,

THE BOENIG LAW FIRM

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